

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

ATKINSON & DeBARTOLO, P.C.
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Attorney for: Debtor, Alexander Figliolia

In Re:

ALEXANDER FIGLIOLIA,

Case No.: 17-20755

Adv. Pro. No.: _____

Chapter: 11

Hearing Date: 04/01/2019

Judge: MBK

ADJOURNMENT REQUEST

1. I, Bunce D. Atkinson,

☒ am the attorney for: Alexander Figliolia, DIP,

☐ am self represented,

and request an adjournment of the following hearing for the reason set forth below.

Matter: Confirmation Hearing

Current hearing date and time: April 1, 2019 @ 10:00 a.m.

New date requested: May 13, 2019 @ 10:00 a.m.

Reason for adjournment request: To allow additional time to address the objections filed to the Second Modified Disclosure Statement and Plan.

2. Consent to adjournment:

☒ I have the consent of all parties. ☐ I do not have the consent of all parties (explain below):

I certify under penalty of perjury that the foregoing is true.

Date: 03/29/2019


/s/ Bunge D. Atkinson
Signature

COURT USE ONLY:

The request for adjournment is:

- ☒ **Granted** New hearing date: 5/13/19 @10:00 ☐ **Peremptory**
- ☐ **Granted over objection(s)** New hearing date: _____ ☐ **Peremptory**
- ☐ **Denied**

IMPORTANT: If your request is granted, you must notify interested parties who are not electronic filers of the new hearing date.

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March 28, 2019

BY E-MAIL ONLY: chambers of mbk@njb.uscourts.gov

Honorable Michael B. Kaplan, U.S.B.J.
United States Bankruptcy Court
402 East State Street
Trenton, NJ 08608

RE: ALEXANDER J. FIGLIOLIA

Chapter 11 Case No. 17-20755/MBK
Hearing on Confirmation: April 1, 2019

Dear Judge Kaplan:

I am writing to request that the hearing scheduled for April 1, 2019 on what would be the Third Modified Disclosure Statement and Plan be adjourned. I have not yet filed the Third Modified Disclosure Statement and Plan, but I am in the process of making changes to the Second Modified Disclosure Statement and Plan to meet the objections of all of the creditors, including the objection filed by the Internal Revenue Service on March 25, 2019. I anticipate filing the Third Modified Disclosure Statement and Plan by Monday, April 8, 2019.

Prior to requesting the adjournment, I obtained the consent and/or no objections from the Office of Melissa Licker, Esq., the attorney for the holder of the first mortgage, from Valerie Hamilton, Esq., the attorney for the New Jersey Division of Taxation who filed an objection to the Second Modified Disclosure Statement and Plan, from Hugh Shull, Esq., the attorney for the objector, The City of New York, from Brandon D. Sherr, Esq., the attorney for an unsecured creditor who filed an objection, from Ward W. Benson, Esq., the attorney for the Internal Revenue Service and from Lauren Bielskie, Esq., the attorney for the Office of the United States Trustee. I am requesting that the matter be adjourned until May 13, 2019. Thank you.

Respectfully submitted,

/s/ Bunce D. Atkinson

BUNCE D. ATKINSON, ESQ.

BDA/jkd

cc: Ward W. Benson, Esq., by e-mail only to: ward.w.benson@usdoj.com
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